



March 1, 2022

RE: Petition for Living History Flight Experience Exemption
Equivalent Level of Safety

The primary focus of Liberty War Bird Association (LWBA) is the safety of the general public, flight crew, and its members. The next priority focus is the preservation of the historic aircraft and equipment being displayed to our audiences. To ensure an equivalent level of safety LWBA, has published a General Operations Manual, Pilot and Crew Chief Training Manual, Safety Management System Manual, and an FAA approved Aircraft Inspection Program.

LWBA's pilot selection and continuing qualification program is based on similar standards used by commercial operators to ensure a high-level safety for the public and LWBA members. LWBA's UH-1 pilots-in-command (PIC) and crew chiefs are former US Army rated aviators and non-rated crewmembers. Five of LWBA's six UH-1 PIC'S have U.S. Army helicopter combat experience and were UH-1 instructor pilots when they served in the Army. LWBA's six currently designated UH-1 PICs hold either a commercial or ATP rotorcraft license with instrument rating in category. They have a total of over 31,000 combined flight hours, 13,250 of which are in UH-1 aircraft. The average total flight time of the current UH-1 PICs is 4,428 total flight hours with an average 1,928 flight hours in the UH-1.

The LWBA program requires the UH-1 be flown with a pilot in command, second in command and crew chief to ensure the highest level of safety during Living History Flight Experience (LFHE) flights. Both pilots and the crew chief must be qualified according to standards of LWBA's Pilot and Crew Chief Training and General Operations Manual to include passenger handling as well as aircraft systems and emergency procedures. LWBA's Director of Operations is responsible for oversight of all UH-1 pilot training and qualifications. LWBA's Director of Operations is a retired U.S. Army Master Aviator who holds an FAA flight instructor certificate with helicopter, instrument helicopter, airplane single engine land, and instrument instructor airplane

ratings. He has extensive experience in UH-1H, AH-1F, and UH-60L working full time for thirty years managing the Maryland Army National Guard's Army Aviation Support Facility's safety, training, operations, and maintenance programs.

LWBA recognizes public interest requires the same level of safety that would be expected in an aircraft certified under standard category. In order to provide this, LWBA's maintenance program adheres to a simple philosophy that proper maintenance is the careful integration of a good inspection program, strict adherence to time limited component life, clear maintenance procedures and processes, correct tools and manuals, and well trained, motivated, and licensed individuals executing the program. Among LWBA's nine UH-1 maintenance personnel, five hold FAA mechanic certificates with airframe and power plant ratings two of which hold inspector authorization.

LWBA uses an FAA approved program that not only duplicates the Army's UH-1 maintenance program, but also expands upon it to ensure the maximum safety for the public and LWBA members. LWBA's inspection program meets the requirements of FAR 91.409 and was originally approved by the FAA in August 2018. It is based on the U.S. Army Maintenance Management System using current manuals, procedures, overhaul standards and inspection requirements. Well trained and experienced personnel are performing the maintenance with tools and test equipment that are either on hand at our facilities or readily available. Also, an active oil analysis program is in place for the aircraft. Finally, all appropriate safety of flight airworthiness information and maintenance manuals are kept current and available either in bound format or electronic format. LWBA's maintenance program is based on an in-depth inspection cycle based on U.S. Army Aviation Unit and Intermediate Maintenance Instructions Army Model UH-1H/V/EH-1H/X Helicopters. Noteworthy are the 25-hour intermediate inspections, 150-hour phase inspections plus an annual condition inspection of the aircraft and power plant. LWBA's powerplant was completely overhauled by Ozark Aeroworks prior to flight operations. LWBA's maintenance interval tracking includes numerous hourly, and calendar special checks designed to detect subsystem problems. The entire program (based on 30 years of flight data) has been optimized to provide careful inspection of components and the airframe to maximize safety and serviceability.

LWBA has flown 75 UH-1 flight hours of incident free flying time in supporting displays, flyovers, and other events honoring Vietnam Veterans and preserving their legacy.

The Director of Safety is a retired Master Army Aviator and qualified aviation safety officer who administers LWBA's safety management system consisting of safety policy, safety risk management, safety assurance, and safety promotion. Safety is a top priority for LWBA leadership and its directors.

We look forward to your positive response to our petition.

Respectfully submitted by:

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President
Liberty War Bird Association, Inc.